

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

Omid Aghazadeh,
Defendant,

v.

Mark Aussieker,
Plaintiff.

Case No. 2:25-cv-00888 TLN AC

**DECLARATION OF OMID AGHAZADEH IN SUPPORT OF DEFENDANT'S
MOTION TO STAY DISCOVERY AND ALL RULE 26 OBLIGATIONS**

I, Omid Aghazadeh, declare as follows:

1. I am the Defendant in the above-captioned matter, proceeding pro se. I make this declaration in support of my Motion to Stay Discovery and All Rule 26 Obligations. I have personal knowledge of the matters stated herein and, if called upon to do so, could and would testify competently thereto.
2. On or about June 5, 2025, I received formal service of process in this case, including a POS-015 Proof of Service form. Prior to receiving formal service, I was hopeful that informal settlement discussions with Plaintiff's counsel would resolve the matter without the need for litigation.
3. After those discussions concluded without resolution, and formal service was received, I promptly filed a Motion to Dismiss and Strike Class Allegations. I am now filing this Motion to Stay Discovery and All Rule 26 Obligations to avoid unnecessary expense and burden while that dispositive motion is pending.
4. I respectfully note that I previously requested and was granted an extension of the joint scheduling report deadline, in part due to a pre-planned personal vacation in late July, 2025. This Motion to Stay Discovery is not related to that vacation request. It is being filed strictly in response to procedural developments and to ensure judicial and party efficiency while the Motion to Dismiss is considered.
5. I believe that staying discovery and deferring Rule 26-related obligations until after the Court rules on my pending motion would conserve resources and minimize unnecessary litigation costs for both sides.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: June 11, 2025

Respectfully submitted,

Omid Aghazadeh
Pro Se Defendant